UNITED STATES BANKRUPTCY COURT	
DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b)	
BROWN RUDNICK LLP	HAYNES AND BOONE, LLP
Kenneth J. Aulet, Esq. (admitted pro hac vice)	Richard S. Kanowitz, Esq. (NJ Bar No. 047911992)
Seven Times Square	Lauren M. Sisson, Esq. (NJ Bar No. 394182022)
New York, New York 10036	30 Rockefeller Plaza, 26th Floor
(212) 209-4800	New York, New York 10112
kaulet@brownrudnick.com	(212) 659-7300
	richard.kanowitz@haynesboone.com
BROWN RUDNICK LLP	lauren.sisson@haynesboone.com
Tristan Axelrod, Esq. (admitted pro hac vice)	
One Financial Center	Attorneys for the Plan Administrator
Boston, MA 02111	
(617)856-8300	
taxelrod@brownrudnick.com	
General Counsel for the Plan Administrator	
GENOVA BURNS LLC	
Daniel M. Stolz, Esq.	
Donald W. Clarke, Esq.	
110 Allen Rd., Suite 304	
Basking Ridge, NJ 07920	
(973) 230-2095	
DStolz@genovaburns.com	
DClarke@genovaburns.com	
Local Counsel for the Plan Administrator	
In re:	Chapter 11
	Case No. 22-19361 (MBK)
BLOCKFI INC., et al.,	(Jointly Administered under a Confirmed Plan ²)
Debtors. ¹	Hearing Date: February 6, 2024
Decitors.	Response Deadline:
	Oral Argument Waived Unless Response Timely Filed

APPLICATION FOR ORDER SHORTENING TIME FOR NOTICE OF WIND-DOWN DEBTORS' MOTION TO REDACT AND FILE CERTAIN INFORMATION UNDER SEAL AND WIND-DOWN DEBTORS' MOTION FOR AN ORDER AUTHORIZING AND APPROVING THE SETTLEMENT AND RELEASE OF CLAIMS AND CAUSES OF ACTION BY AND AMONG THE WIND-DOWN DEBTORS AND 3AC

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The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Wind-Down Debtors' service address is c/o M3 Partners, 1700 Broadway, 19th Floor, New York, NY 10019.

On October 3, 2023, the Court entered an order confirming the Third Amended Joint Chapter 11 Plan of BlockFi Inc. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Additional Technical Modifications) (the "Plan") [Docket No. 1609].

TO: THE HONORABLE CHIEF JUDGE MICHAEL B. KAPLAN UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY

BlockFi Inc. and its debtor affiliates (the "Wind-Down Debtors," previously the "Debtors"), by and through their undersigned counsel, request that the time period to notice a hearing on the *Motion to Redact and File Certain Information Under Seal* ("Motion to Seal") in connection with the simultaneously filed *Wind-Down Debtors' Motion for an Order (I) Authorizing and Approving the Settlement and Release of Claims and Causes of Action By and Among the Wind-Down Debtors and 3AC and (II) Granting Related Relief (the "9019 Motion"), as required by Fed. R. Bankr. P. 2002 be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1), for the reason(s) set forth below:*

- 1. Contemporaneously herewith, the Wind-Down Debtors filed the Motion to Seal and the 9019 Motion. The Motion to Seal seeks a protective order in relation to the 9019 Motion which seeks approval of the settlement between the Wind-Down Debtors and 3AC.
- 2. The Wind-Down Debtors respectfully request that the Court enter the proposed order scheduling a hearing on the Motion to Seal and the 9019 Motion on <u>February 6, 2024, at</u> <u>10:00 a.m. ET</u>. Shortened notice is required because delaying approval of the 9019 Motion will impact the Debtors' ability to make distributions out of Lending LLC; and
- 3. A shortened notice period will not prejudice any parties and is not prohibited under FED. R. BANKR. P. 9006(c)(1).

WHEREFORE, the Debtors respectfully request entry of the Order shortening the notice period for the Motion to Quash, and for such other and further relief as the Court may deem just and appropriate.

Respectfully Submitted,

Dated: January 18, 2024 /s/ Donald W. Clarke

GENOVA BURNS LLC

Daniel M. Stolz, Esq.
Donald W. Clarke, Esq.
Susan S. Long, Esq.
110 Allen Rd., Suite 304
Basking Ridge, NJ 07920
(973) 230-2095
DStolz@genovaburns.com
DClarke@genovaburns.com
SLong@genovaburns.com

Local Counsel to the Plan Administrator